

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

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|-------------------------------|---|-----------------------------|
| RYAN O'CONNOR, |) | CASE NO. 1:20-cv-01429 |
| |) | |
| Plaintiff |) | JUDGE SOLOMON OLIVER, JR. |
| |) | |
| vs. |) | DEFENDANT KAZIMER'S |
| |) | UNOPPOSED MOTION |
| OFFICER JOHN KAZIMER, et al., |) | FOR 30-DAY EXTENSION |
| |) | OF TIME TO FILE |
| Defendants |) | RESPONSIVE PLEADING |

Defendant John Kazimer, by and through the undersigned counsel, respectfully moves the Court pursuant to Fed.R.Civ.P. 6(b)(1)(A) for a thirty (30) day extension of time, until September 3, 2020, to answer, move, or otherwise plead in response to the Complaint of Plaintiff.

The Complaint was filed in this Court on June 29, 2020. The City's initial responsive pleading deadline is 21 days from the date of service, pursuant to Fed.R.Civ.P. 12(a)(1)(A)(i). Twenty-one days from the date of service on Defendant Kazimer (which was July 14, 2020, per the Proof of Service forms, Doc. # 3, erroneously recorded by the Clerk as July 10, 2020) is August 4, 2020. A thirty-day extension of time from August 4, 2020, would permit a responsive pleading on or before September 3, 2020.

Defendants collectively reached out to Plaintiff's counsel who do not oppose this extension. The grounds for this motion are that good cause exists in that additional time would be beneficial in investigating the claims of Plaintiff in order to provide a more specific response than otherwise would be possible. "The district court has broad discretion to enlarge the time for any

action.” *Jarrett v. Toxic Action Wash*, No. 95-3702, 1996 WL 690160, *1 (6th Cir. Nov. 27, 1996),
citing Fed.R.Civ.P. 6(b)(1).

Therefore, for the foregoing reasons, Defendant respectfully moves the Court for leave to
answer, move, or otherwise plead in response to the Complaint on or before September 3, 2020.

Respectfully submitted,

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Attorneys for Defendant John Kazimer

CERTIFICATE OF SERVICE

The foregoing was filed electronically via operation of the Court’s ECF system and is
available to all parties of record.

By: s/ Elena N. Boop
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